Federal Defenders of NEW YORK, INC.

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December 20, 2021

David E, Patton Executive Director Southern District of New York Jennifer L. Brown Attorney-in-Charge

BY ECF

Honorable Sidney H. Stein United States District Judge Southern District of New York 500 Pearl Street New York, NY 10007

Re: <u>United States v. Joe Young et. al</u> 21 Cr. 486 (SHS)

Dear Judge Stein:

Cc:

Counsel of Record

I represent Joe Young in the above-captioned case and write on behalf of him and his three co-defendants to request a 45-day adjournment of the status conference, currently scheduled for 2:30 p.m. on Wednesday, December 22, 2021. The Government does not object to this request.

An adjournment is appropriate because the parties have been engaged in plea negotiations with respect to Mr. Young and the Government has recently made a formal offer that Mr. Young and I require time to review and consider. The parties, including Mr. Young's co-defendants, agree that the exclusion of this 45-day period from Speedy Trial Act calculations is justified because the delay is necessary to advance productive discussions about a possible pre-trial disposition. 18 U.S.C. § 3161(h)(7)(A):

Respectfully Submitted,

Andrew J. Dallack, Esq. Assistant Federal Defender

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